

Osberg v. Foot Locker, Inc., et al., 07-cv-01358 (KBF) (S.D.N.Y.)

**Class's Opposition to Defendants' Motion *in Limine*
to Exclude Testimony of Christopher Maikels**

July 10, 2015

PX1277

MMCALC (10) REG0196

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DO DOCUMENTATION (INFORMATION)

CLIENT: FWW WOOLWORTH
PROJECT: STATEMENTSCODER: C MAIKELS
TKS CODE:*Super ceded*

DO DOCUMENTATION (NOTES)

CALCULATE ESTIMATED BENEFITS FOR 01/01/96 ESTIMATE REGISTER

OP MMCALC OPTIONS

DB NAME	VALUATION DATE	SS LAW DATE	SAL LIMITS LAW YEAR	EDIT DECK (BLANK, Y)	TRACE CALCS (BLANK, Y)	TRACE SS (BLANK, Y)	REC # FOR TEST	LENGTH FOR UNDEF WRKFLDS	DECIMALS FOR UNDEF WRKFLDS
CB95	1 / 1 / 95	/ /							

DATE LABELS

LINE	DATE LABEL	'<' '>'	MONTH FIELD	DAY FIELD	YEAR FIELD
1	\$BIRTH	<	MOB	DOB	YOB ✓

Using a statement data base

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BC BENEFIT CALCULATION

LINE	GROUP FIELD	STATEMENT	AS OF DATE LABEL
1		DO SC(1)/SC(2)/SC(3)/SC(4)/SC(5)/SC(6)	
2		* GET 9% FACTOR	
3		DO TL(1)/TL(2) ✓	
4		INT1=AGENOW-AGEFLOOR ✓	
5		LS9FACT=INT1*FACTOR9B+(1-INT1)*FACTOR9A ✓	
6		* GET 6.5% FACTOR	
7		DO TL(3)/TL(4) ✓	
8		LS65FCT=INT1*FACTOR6B+(1-INT1)*FACTOR6A ✓	
9		* GET 6.5% IMMEDIATE FACTOR	
10		DO TL(5)/TL(6) ✓	
11		IMM1196=INT1*FACTOR6D+(1-INT1)*FACTOR6C ✓	
12		* GET ENHANCED CB ER FACTOR	
13		ER2=VESTSVC+1.GE.15.AND.YOB.LT.46 ✓	
14		ERF=1 ✓	
15	ER2	ERF=(1-((65-AGENOW)*.04))>.6 ✓	
16		* CASH BALANCE & MIN LUMP SUM	
17		CB123195=ACCBEN94*LS9FACT/ERF ✓	
18		PV123195=ACCBEN94*LS65FCT ✓	
19		*	
20		* GET ER FACTOR AT 1/1/96	
21		ER3=VESTSVC+1.GE.15 ✓	
22		ER1196=(1-((65-AGENOW)*.06))>.4 ✓	
23	ER3	ER1196=(1-((65-AGENOW)*.04))>.6 ✓	
24		* GET BENEFIT AMOUNTS	
25		AGENOWLS=CB123195>PV123195 ✓	
26		SLA65=ACCBEN94 ✓	
27		JS6550ST=SLA65*.91 ✓	
28		JS6575ST=SLA65*.87 ✓	
29		JS6500ST=SLA65*.83 ✓	
30		CL6560=SLA65*.98 ✓	
31		CL65120=SLA65*.94 ✓	
32		* GET IMMEDIATE BENEFITS (AT OR OVER 55)	
33		SLANOW=SLA65*ER1196 ✓	
34		JSNOW50=SLANOW*.91 ✓	
35		JSNOW75=SLANOW*.87 ✓	
36		JSNOW100=SLANOW*.83 ✓	
37		CLNOW60=SLANOW*.98 ✓	
38		CLNOW120=SLANOW*.94 ✓	
39		* GET IMMEDIATE BENEFITS (UNDER 55)	
40		UNDER=YOB.GE.42 ✓	
41	UNDER	SLAIMM=CB123195/IMM1196 ✓	
42	UNDER	JS50IMM=SLAIMM*.91 ✓	
43		*	
44		MIN65LS=AC123195*10.24675	
45		CB65LS=CB123195*((1.06)**(65-AGENOW)) not used	
46		AGE65LS=CB65LS>MIN65LS	

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SC SERVICE CALCULATION

LINE	DECIMAL	RESULT FIELDS			DATE LABEL	DATE	SERVICE	TYPE SRVC	RNDG CODE	MAX YRS OF SRVC
		YRS	YEARS	MONTHS						
1	AGEFLOOR				1) \$BIRTH	1 / 1 / 1996	✓		3	✓
2	AGEPLUS1				1) \$BIRTH	1 / 1 / 1997	✓		3	✓
3	AGENOW				1) \$BIRTH	1 / 1 / 1996	✓		2	✓
4	AGE2196				2) \$BIRTH	2 / 1 / 1996			2	
5	AGFL2196				1) \$BIRTH	2 / 1 / 1996			3	
6	AGPL2196				2) \$BIRTH	2 / 1 / 1997			3	

1 TABLE LOOKUP

LINE	RESULT FIELD	TABLE NAME	TABLE TYPE	LOOKUP FIELD
1	FACTOR9A	GATT900	1	AGEFLOOR ✓
2	FACTOR9B	GATT900	1	AGEPLUS1 ✓
3	FACTOR6A	GATT650	1	AGEFLOOR ✓
4	FACTOR6B	GATT650	1	AGEPLUS1 ✓
5	FACTOR6C	GATTIMM	1	AGEFLOOR ✓
6	FACTOR6D	GATTIMM	1	AGEPLUS1 ✓

CONTROL TOTALS

SCREEN	LINES	TOTAL
DO	1	-97.
DO	1	-4092.
OP	1	2479.
DL	1	-3193.
BC	46	-39252849.
SC	6	456059.
T	6	101727.
TOTAL	62	-38699966.

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EXACT TL:GATT900	EXACT TL:GATT900	EXACT TL:GATT650			
21.000000	0.174 21.000000	0.174 21.000000	0.575 81.000000	5.361 81.000000	5.959
22.000000	0.189 22.000000	0.189 22.000000	0.612 82.000000	5.157 82.000000	5.710
23.000000	0.207 23.000000	0.207 23.000000	0.652 83.000000	4.957 83.000000	5.466
24.000000	0.225 24.000000	0.225 24.000000	0.695 84.000000	4.761 84.000000	5.229
25.000000	0.246 25.000000	0.246 25.000000	0.740 85.000000	4.567 85.000000	4.997
26.000000	0.268 26.000000	0.268 26.000000	0.788 86.000000	4.376 86.000000	4.769
27.000000	0.292 27.000000	0.292 27.000000	0.840 87.000000	4.187 87.000000	4.546
28.000000	0.318 28.000000	0.318 28.000000	0.895 88.000000	4.001 88.000000	4.327
29.000000	0.347 29.000000	0.347 29.000000	0.954 89.000000	3.816 89.000000	4.113
30.000000	0.379 30.000000	0.379 30.000000	1.016 90.000000	3.636 90.000000	3.904
31.000000	0.413 31.000000	0.413 31.000000	1.083		
32.000000	0.450 32.000000	0.450 32.000000	1.154		
33.000000	0.491 33.000000	0.491 33.000000	1.229		
34.000000	0.535 34.000000	0.535 34.000000	1.310		
35.000000	0.584 35.000000	0.584 35.000000	1.396		
36.000000	0.637 36.000000	0.637 36.000000	1.488		
37.000000	0.695 37.000000	0.695 37.000000	1.585		
38.000000	0.758 38.000000	0.758 38.000000	1.690		
39.000000	0.827 39.000000	0.827 39.000000	1.801		
40.000000	0.902 40.000000	0.902 40.000000	1.920		
41.000000	0.984 41.000000	0.984 41.000000	2.046		
42.000000	1.074 42.000000	1.074 42.000000	2.182		
43.000000	1.172 43.000000	1.172 43.000000	2.326		
44.000000	1.279 44.000000	1.279 44.000000	2.481		
45.000000	1.396 45.000000	1.396 45.000000	2.646		
46.000000	1.524 46.000000	1.524 46.000000	2.822		
47.000000	1.664 47.000000	1.664 47.000000	3.011		
48.000000	1.818 48.000000	1.818 48.000000	3.213		
49.000000	1.986 49.000000	1.986 49.000000	3.430		
50.000000	2.170 50.000000	2.170 50.000000	3.662		
51.000000	2.372 51.000000	2.372 51.000000	3.911		
52.000000	2.593 52.000000	2.593 52.000000	4.177		
53.000000	2.836 53.000000	2.836 53.000000	4.464		
54.000000	3.102 54.000000	3.102 54.000000	4.772		
55.000000	3.395 55.000000	3.395 55.000000	5.102		
56.000000	3.717 56.000000	3.717 56.000000	5.457		
57.000000	4.071 57.000000	4.071 57.000000	5.840		
58.000000	4.460 58.000000	4.460 58.000000	6.251		
59.000000	4.888 59.000000	4.888 59.000000	6.695		
60.000000	5.361 60.000000	5.361 60.000000	7.174		
61.000000	5.883 61.000000	5.883 61.000000	7.692		
62.000000	6.460 62.000000	6.460 62.000000	8.253		
63.000000	7.100 63.000000	7.100 63.000000	8.861		
64.000000	7.810 64.000000	7.810 64.000000	9.524		
65.000000	8.600 65.000000	8.600 65.000000	10.247		
66.000000	8.425 66.000000	8.425 66.000000	9.996		
67.000000	8.245 67.000000	8.245 67.000000	9.740		
68.000000	8.060 68.000000	8.060 68.000000	9.479		
69.000000	7.870 69.000000	7.870 69.000000	9.215		
70.000000	7.675 70.000000	7.675 70.000000	8.947		
71.000000	7.475 71.000000	7.475 71.000000	8.675		
72.000000	7.271 72.000000	7.271 72.000000	8.401		
73.000000	7.063 73.000000	7.063 73.000000	8.124		
74.000000	6.851 74.000000	6.851 74.000000	7.846		
75.000000	6.637 75.000000	6.637 75.000000	7.568		
76.000000	6.422 76.000000	6.422 76.000000	7.290		
77.000000	6.206 77.000000	6.206 77.000000	7.015		
78.000000	5.991 78.000000	5.991 78.000000	6.744		
79.000000	5.778 79.000000	5.778 79.000000	6.477		
80.000000	5.568 80.000000	5.568 80.000000	6.215		

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EXACT	TL:GATT650	EXACT	TL:GATTIMM	EXACT	TL:GATTIMM				
21.000000	0.575	21.000000	15.356	21.000000	15.356	81.000000	5.959	81.000000	5.959
22.000000	0.612	22.000000	15.324	22.000000	15.324	82.000000	5.710	82.000000	5.710
23.000000	0.652	23.000000	15.289	23.000000	15.289	83.000000	5.466	83.000000	5.466
24.000000	0.695	24.000000	15.253	24.000000	15.253	84.000000	5.229	84.000000	5.229
25.000000	0.740	25.000000	15.215	25.000000	15.215	85.000000	4.997	85.000000	4.997
26.000000	0.788	26.000000	15.174	26.000000	15.174	86.000000	4.769	86.000000	4.769
27.000000	0.840	27.000000	15.131	27.000000	15.131	87.000000	4.546	87.000000	4.546
28.000000	0.895	28.000000	15.086	28.000000	15.086	88.000000	4.327	88.000000	4.327
29.000000	0.954	29.000000	15.038	29.000000	15.038	89.000000	4.113	89.000000	4.113
30.000000	1.016	30.000000	14.987	30.000000	14.987	90.000000	3.904	90.000000	3.904
31.000000	1.083	31.000000	14.933	31.000000	14.933				
32.000000	1.154	32.000000	14.876	32.000000	14.876				
33.000000	1.229	33.000000	14.816	33.000000	14.816				
34.000000	1.310	34.000000	14.753	34.000000	14.753				
35.000000	1.396	35.000000	14.686	35.000000	14.686				
36.000000	1.488	36.000000	14.615	36.000000	14.615				
37.000000	1.585	37.000000	14.540	37.000000	14.540				
38.000000	1.690	38.000000	14.461	38.000000	14.461				
39.000000	1.801	39.000000	14.378	39.000000	14.378				
40.000000	1.920	40.000000	14.290	40.000000	14.290				
41.000000	2.046	41.000000	14.198	41.000000	14.198				
42.000000	2.182	42.000000	14.101	42.000000	14.101				
43.000000	2.326	43.000000	13.999	43.000000	13.999				
44.000000	2.481	44.000000	13.892	44.000000	13.892				
45.000000	2.646	45.000000	13.780	45.000000	13.780				
46.000000	2.822	46.000000	13.663	46.000000	13.663				
47.000000	3.011	47.000000	13.541	47.000000	13.541				
48.000000	3.213	48.000000	13.414	48.000000	13.414				
49.000000	3.430	49.000000	13.282	49.000000	13.282				
50.000000	3.662	50.000000	13.144	50.000000	13.144				
51.000000	3.911	51.000000	13.000	51.000000	13.000				
52.000000	4.177	52.000000	12.851	52.000000	12.851				
53.000000	4.464	53.000000	12.695	53.000000	12.695				
54.000000	4.772	54.000000	12.533	54.000000	12.533				
55.000000	5.102	55.000000	12.363	55.000000	12.363				
56.000000	5.457	56.000000	12.186	56.000000	12.186				
57.000000	5.840	57.000000	12.002	57.000000	12.002				
58.000000	6.251	58.000000	11.810	58.000000	11.810				
59.000000	6.695	59.000000	11.609	59.000000	11.609				
60.000000	7.174	60.000000	11.401	60.000000	11.401				
61.000000	7.692	61.000000	11.185	61.000000	11.185				
62.000000	8.253	62.000000	10.961	62.000000	10.961				
63.000000	8.861	63.000000	10.730	63.000000	10.730				
64.000000	9.524	64.000000	10.492	64.000000	10.492				
65.000000	10.247	65.000000	10.247	65.000000	10.247				
66.000000	9.996	66.000000	9.996	66.000000	9.996				
67.000000	9.740	67.000000	9.740	67.000000	9.740				
68.000000	9.479	68.000000	9.479	68.000000	9.479				
69.000000	9.215	69.000000	9.215	69.000000	9.215				
70.000000	8.947	70.000000	8.947	70.000000	8.947				
71.000000	8.675	71.000000	8.675	71.000000	8.675				
72.000000	8.401	72.000000	8.401	72.000000	8.401				
73.000000	8.124	73.000000	8.124	73.000000	8.124				
74.000000	7.846	74.000000	7.846	74.000000	7.846				
75.000000	7.568	75.000000	7.568	75.000000	7.568				
76.000000	7.290	76.000000	7.290	76.000000	7.290				
77.000000	7.015	77.000000	7.015	77.000000	7.015				
78.000000	6.744	78.000000	6.744	78.000000	6.744				
79.000000	6.477	79.000000	6.477	79.000000	6.477				
80.000000	6.215	80.000000	6.215	80.000000	6.215				

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DICTIONARY OF FIELDS IN '\$WRK\$'-

	FIELD NAME	LENGTH	TYPE	DEC	DESCRIPTION
109	\$BIRTH	8	N	0	DATE LABEL
110	AGEFLOOR	9	N	6	RESULT FIELD
111	AGEPLUS1	9	N	6	RESULT FIELD
112	AGENOW	9	N	6	RESULT FIELD
113	AGE2196	9	N	6	RESULT FIELD
114	AGFL2196	9	N	6	RESULT FIELD
115	AGPL2196	9	N	6	RESULT FIELD
116	FACTOR9A	9	N	3	RESULT FIELD
117	FACTOR9B	9	N	3	RESULT FIELD
118	FACTOR6A	9	N	3	RESULT FIELD
119	FACTOR6B	9	N	3	RESULT FIELD
120	FACTOR6C	9	N	3	RESULT FIELD
121	FACTOR6D	9	N	3	RESULT FIELD
122	INT1	9	N	3	RESULT FIELD
123	LS9FACT	9	N	3	RESULT FIELD
124	LS65FCT	9	N	3	RESULT FIELD
125	IMM1196	9	N	3	RESULT FIELD
126	ER2	1	N	0	RESULT FIELD
127	ER3	1	N	0	RESULT FIELD
128	UNDER	1	N	0	RESULT FIELD
129	MIN65LS	9	N	3	RESULT FIELD
130	AC123195	9	N	3	OPERAND
131	CB65LS	9	N	3	RESULT FIELD
132	AGE65LS	9	N	3	RESULT FIELD

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19346 RECORDS PROCESSED

BC LINE #	NUMBER PROCESSED	NUMBER OVERFLOWS
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1	19346	0
3	19346	0
4	19346	0
5	19346	0
7	19346	0
8	19346	0
10	19346	0
11	19346	0
13	19346	0
14	19346	0
15	2095	0
17	19346	0
18	19346	0
21	19346	0
22	19346	0
23	4337	0
25	19346	0
26	19346	0
27	19346	0
28	19346	0
29	19346	0
30	19346	0
31	19346	0
33	19346	0
34	19346	0
35	19346	0
36	19346	0
37	19346	0
38	19346	0
40	19346	0
41	16492	0
42	16492	0
44	19346	0
45	19346	1
46	19346	0

*** CHECK

1 OVERFLOWS ***

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